

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
GREENEVILLE

KATERI LYNEE DAHL,]
[
Plaintiff,]
[
v.] No. 2:22-cv-00072-KAC-JEM
[JURY DEMAND
CHIEF KARL TURNER, and]
CITY OF JOHNSON CITY, TENNESSEE,]
[
Defendants.]

**MOTION IN LIMINE TO EXCLUDE TESTIMONY AND
EVIDENCE RELATED TO CERTAIN ALLEGED EVENTS
OCCURRING AFTER THE NON-RENEWAL OF MS. DAHL'S CONTRACT**

Comes the City of Johnson City, Tennessee and Karl Turner, in his individual capacity, and move this Court for an Order excluding any testimony or other evidence related to certain alleged events occurring after the non-renewal of Ms. Dahl's contract. The grounds for this motion are Federal Rule of Evidence 402 (lack of relevance) and/or Rule 403 (any probative value is substantially outweighed by either unfair prejudice, confusing the issues or misleading the jury). This Motion is supported by a Memorandum Brief.

Respectfully submitted,

s/K. Erickson Herrin
K. Erickson Herrin, BPR # 012110
HERRIN, McPEAK & ASSOCIATES
515 East Unaka Avenue
P. O. Box 629
Johnson City, TN 37605-0629
Phone: (423) 929-7113
Fax: (423) 929-7114
Email: lisa@hbm-lawfirm.com

s/ Thomas J. Garland, Jr.
Thomas J. Garland, Jr., BPR # 011495
MILLIGAN & COLEMAN PLLP

P.O. Box 1060
Greeneville, TN 37744-1060
Phone: (423) 639-6811
Fax: (423) 639-0278
Email: tgarland@milligancoleman.com

s/ Emily C. Taylor
Emily C. Taylor, BPR # 27157
WATSON, ROACH, BATSON &
LAUDERBACK, P.L.C.
P.O. Box 131
Knoxville, TN 37901-0131
Phone: (865) 637-1700
Email: etaylor@watsonroach.com

Attorneys for Defendants